

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Dawn Elaine, for herself and a class,
Plaintiff

v.

Credit Control, LLC,
LVNV Funding, LLC,
Resurgent Capital Services, LP and
Alegis Group, LLC
Defendants

Docket 2:15-cv-01271-WB

(JUDGE WENDY BEETLESTONE)

PLAINTIFF'S MOTION IN LIMINE REGARDING STATUTORY DAMAGES

For the reasons contained in the accompanying brief, Plaintiff, Dawn Elaine, hereby requests that the Court enter an order precluding Defendants Credit Control, LLC, LVNV Funding, LLC, and Resurgent Capital Services, LP (“Defendants”) from arguing that Plaintiff and the Class can only recover a statutory damage award from only one Defendant and ordering that the jury should be instructed that each Defendant may be found liable to the Class for a statutory damage award in an amount not to exceed one percent of each Defendant’s net worth.

/s/ Francis R. Greene
Francis R. Greene

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CERTIFICATE OF SERVICE

I, Francis R. Greene, hereby certify that Defendants' counsel is being served through the CM/ECF system.

/s/ Francis R. Greene
Francis R. Greene

CERTIFICATE REGARDING NONCONCURRENCE

Defendants **do not** concur with the relief requested in this motion

/s/ Francis R. Greene
Francis R. Greene